

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HALMAN ALDUBI PROVIDENT AND
PENSION FUNDS LTD., Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,
v.

TEVA PHARMACEUTICALS INDUSTRIES
LIMITED, EREZ VIGODMAN, EYAL
DESHEH, ROBERT KOREMANS, MICHAEL
DERKACZ, KARE SCHULTZ, MICHAEL
MCQUELLAN, BRENDAN O'GRADY, and
ELI KALIF,

Defendants.

Civil Action No.: 2:20-cv-04660

Hon. Karen S. Marston

**DEFENDANTS' MOTION TO DISMISS
THE CORRECTED AMENDED COMPLAINT**

Defendants Teva Pharmaceuticals Industries Limited, Erez Vigodman, Eyal Desheh, Robert Koremans, Michael Derkacz, Kare Schultz, Michael McClellan, Brendan O'Grady, and Eli Kalif, by and through their counsel, move to dismiss the Corrected Amended Complaint (ECF No. 64-2), with prejudice, for failure to state a claim upon which relief may be granted in accordance with Federal Rule of Civil Procedure 12(b)(6). In support of this Motion, Defendants submit the attached Memorandum of Law, which is incorporated in full.

Respectfully submitted this 23rd day of August, 2021,

/s/ Mathieu J. Shapiro

Mathieu J. Shapiro (I.D. No. 76266)
OBERMAYER REBMANN
MAXWELL & HIPPEL LLP
Centre Square West, Suite 3400
1500 Market Street
Philadelphia, PA 19102
Telephone: (215) 665-3014
Mathieu.Shapiro@obermayer.com

James P. Smith III (admitted *pro hac vice*)
Kerry C. Donovan (admitted *pro hac vice*)
WINSTON & STRAWN LLP
200 Park Avenue
New York, New York 10166
Telephone: (212) 294-6700
jpsmith@winston.com
kcdonovan@winston.com

Linda Coberly (admitted *pro hac vice*)
Daniel M. Blouin, I.D. No. 308536
WINSTON & STRAWN LLP
35 West Wacker Drive, Suite 4700
Chicago, Illinois 60601
Telephone: (312) 558-5600
dblouin@winston.com
lcoberly@winston.com

Attorneys for Defendants